

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	Case No.: 2:15-MJ-168
)	
JONATHAN ZAMPIERI,)	
Defendant)	

MOTION FOR DETENTION

The United States moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This is an eligible case for detention because the case involves a crime of violence. 18 U.S.C. § 3142(f)(1)(A).

2. Reason For Detention. The Court should detain the defendant because he presents a significant risk of flight and a serious danger to the community. The defendant has a serious criminal history which includes numerous misdemeanor convictions and two or more convictions for violating conditions of release. He also has at least two felony convictions for escape, felony convictions for grand larceny and DUI, a history of failing to appear in court and a history of violating probation and parole.

Most troubling however are the facts of this particular offense. The acts which occurred on December 13, 2015 in Northfield can only be described as depraved. It shocks the conscience that someone would douse another person in gasoline and then light them on fire. There are few facts more horrifying than those in this case. The defendant voluntarily participated in this heinous crime and because of his actions, one person is dead and another is critically injured.

Even if the defendant's criminal history did not establish his flight risk or danger, the facts of this case would. For these reasons, the government believes there are no conditions this Court could set which would protect the public from the defendant or assure his appearance in court, and thus the Court should detain the defendant pending trial.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against the defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests a three-day continuance of the detention hearing.

Dated at Burlington, in the District of Vermont, December 16, 2015.

Respectfully submitted,

UNITED STATES OF AMERICA
ERIC MILLER
United States Attorney

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